

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Angie Davis v. St. Louis County, Missouri, et al.

Davis · No. 4:25-cv-00695-SEP · Decided March 30, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri addresses motions to dismiss claims arising from the death of a detainee, Dwight Williams, in the St. Louis County Jail. The court denies dismissal of the deliberate-indifference claims against nurses David Dooley and Janie Stephens, but dismisses claims against the remaining individual defendants and St. Louis County, including municipal-liability, supervisory-liability, ADA, and Rehabilitation Act claims. The court also considers a service-of-process challenge by defendant Lisa Maxwell.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Sarah E. Pitlyk
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	March 30, 2026
DOCKET	4:25-cv-00695-SEP
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983, the Americans with Disabilities Act, and the Rehabilitation Act arising from the death of her son while in custody at the St. Louis County Jail. Defendants moved to dismiss under Rules 12(b)(5) and 12(b)(6), and the court granted the motions in part and denied them in part.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, draws reasonable inferences in favor of the nonmoving party, and determines whether the complaint states a plausible claim for relief. Under Rule 12(b)(5), the plaintiff bears the burden of showing proper service; Rule 4(m) requires service within ninety days after filing the complaint, subject to extension or dismissal.

PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive authority only
PARTIES	Angie Davis v. St. Louis County, Missouri, David Dooley, Janie Stephens, Kelly Wilkens, Valerie Nelson, Dawn Davis, Lisa Maxwell

TOPICS

motions to dismiss

service of process

section 1983

ada / disability

municipal liability

PRACTICE AREAS

civil procedure

civil rights

constitutional law

health law

municipal law

disability discrimination

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged that David Dooley and Janie Stephens were deliberately indifferent to Williams's serious medical needs by failing to provide his prescribed Suboxone.
2. Whether the complaint plausibly alleged municipal liability against St. Louis County based on an unconstitutional policy, custom, or failure to train or supervise.
3. Whether the complaint plausibly alleged individual supervisory liability against St. Louis County, Dawn Davis, Valerie Nelson, and Lisa Maxwell for failure to train, supervise, or discipline.
4. Whether the ADA and Rehabilitation Act claims were actionable where the alleged misconduct consisted solely of inadequate medical treatment rather than disability-based discrimination.
5. Whether Lisa Maxwell waived or established a defense based on insufficient service of process, and whether plaintiff should receive additional time to effect proper service.

HOLDINGS

1. The complaint plausibly alleged deliberate indifference claims against Dooley and Stephens because it alleged that Williams had a serious medical need, that both defendants knew of his Suboxone prescription and withdrawal, and that they intentionally failed to provide the prescribed treatment.
2. The complaint failed to state a deliberate-indifference claim against Kelly Wilkens, Dawn Davis, or Valerie Nelson because it did not specifically allege that they knew of Williams's serious medical need or his Suboxone prescription.
3. The complaint failed to state a § 1983 municipal-custom claim against St. Louis County.
4. The complaint failed to state failure-to-train, failure-to-supervise, or failure-to-discipline claims against St. Louis County, Dawn Davis, Valerie Nelson, and Lisa Maxwell.
5. The ADA and Rehabilitation Act claims failed because the complaint alleged inadequate medical treatment, not discrimination based on disability or denial of services because of disability.
6. Maxwell did not waive her insufficient-service defense by asserting it in her proposed answer, but the court granted plaintiff fourteen days to properly serve her and file an executed proof of service.

KEY QUOTATIONS

“To meet this standard and survive a Rule 12(b)(6) motion to dismiss, “a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’””

“Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice.”

“There is a difference between alleging inadequate treatment for a prisoner’s disability and alleging that a prisoner was denied access to medical services because of his or her disability.”

FACTUAL BACKGROUND

Dwight Williams was arrested on May 14, 2020, and transported to the St. Louis County Jail, where he reported opioid-use-disorder treatment with prescribed Suboxone and a recently treated, infected hand. Nurse David Dooley determined that Williams was experiencing acute withdrawal but provided other medications instead of Suboxone, and Janie Stephens knew of the prescription but did not ensure that he received it. Williams was found unresponsive in his cell the next morning and later died; the medical examiner attributed his death to cardiomyopathy exacerbated by opioid withdrawal. The complaint also alleged longstanding failures at the jail to provide prescribed opioid-use-disorder medications, but the court found those allegations insufficiently specific to establish municipal or supervisory liability.

PROCEDURAL HISTORY

The complaint alleged deliberate indifference to serious medical needs, municipal liability, supervisory failure to train or supervise, and ADA and Rehabilitation Act violations. The court dismissed Counts II, III, IV, and V without prejudice; dismissed Count I as to Kelly Wilkens, Dawn Davis, and Valerie Nelson; allowed the deliberate-indifference claim against David Dooley and Janie Stephens to proceed; and ordered plaintiff to file an amended proof of service for Lisa Maxwell within fourteen days.

DISPOSITION

other

REMAND INSTRUCTIONS

Plaintiff must file, within fourteen days of the memorandum and order, an amended proof of service under Federal Rule of Civil Procedure 4(e) showing that Lisa Maxwell was properly and timely served. If plaintiff fails to comply, she must show cause why the claims against Maxwell should not be dismissed without prejudice, and the claims will be dismissed without further notice if the failure is not timely cured.

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 326-27 (1989)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-82 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 567, 570 (2007)
- Park Irmat Drug Corp. v. Express Scripts Holding Co., 911 F.3d 505, 512 (8th Cir. 2018)

- Whitney v. Guys, Inc., 700 F.3d 1118, 1128 (8th Cir. 2012)
- Huggins v. FedEx Ground Package Sys., Inc., 592 F.3d 853 (8th Cir. 2010)
- Lustgraaf v. Behrens, 619 F.3d 867, 873 (8th Cir. 2010)
- Crest Constr. II, Inc. v. Doe, 660 F.3d 346, 355 (8th Cir. 2011)
- Morris v. Zefferi, 601 F.3d 805, 809 (8th Cir. 2010)
- Grayson v. Ross, 454 F.3d 802, 808 (8th Cir. 2006)
- Morris v. Craddock, 954 F.3d 1055, 1058 (8th Cir. 2020)
- Estelle v. Gamble, 429 U.S. 97, 103-05 (1976)
- McRaven v. Sanders, 577 F.3d 974, 980 (8th Cir. 2009)
- Vaughn v. Gray, 557 F.3d 904 (8th Cir. 2009)
- Holden v. Hirner, 663 F.3d 336, 342 (8th Cir. 2011)
- Coleman v. Rahija, 114 F.3d 778, 784 (8th Cir. 1997)
- Nur v. Ollm... [citation text corrupted in source]
- Bramlett v. ... [citation text corrupted in source]
- Dulany v. Carnahan, 132 F.3d 1234, 1239 (8th Cir. 1997)
- Troupe v. Young, 143 F.4th 955, 972-73 (8th Cir. 2025)
- Corwin v. City of Independence, 829 F.3d 695, 699 (8th Cir. 2016)
- Johnson v. Douglas County Medical Department, 725 F.3d 825, 828 (8th Cir. 2013)
- Atkinson v. City of Mtn. View, [citation incomplete in source]
- Watkins v. City of St. Louis, 102 F.4th 947, 953-54 (8th Cir. 2024)
- Mitchell v. Saint Louis County, Mo., 160 F.4th 950, 962-63 (8th Cir. 2025)
- Ulrich v. Pope County, 715 F.3d 1054, 1061 (8th Cir. 2013)
- Andrews v. Fowler, 98 F.3d 1069, 1076, 1078 (8th Cir. 1996)
- Tlamka v. Serrell, 244 F.3d 628, 635 (8th Cir. 2001)
- Davis v. Buchanan County, Mo., 11 F.4th 604, 624 (8th Cir. 2021)
- S.M. v. Krigbaum, 808 F.3d 335, 340 (8th Cir. 2015)
- Livers v. Schenck, 700 F.3d 340, 355 (8th Cir. 2012)
- Randolph v. Rogers, 170 F.3d 850, 857-58 (8th Cir. 1999)
- Pennsylvania Dept. of Corr. v. Yeskey, 524 U.S. 206, 210 (1998)
- Gorman v. Bartch, 152 F.3d 907, 912 (8th Cir. 1998)
- Postawko v. Missouri Department of Corrections, 2017 WL 1968317, at *13 (W.D. Mo. May 11, 2017)
- Rogers v. Missouri Department of Corrections, 2011 WL 3320521, at *4 (W.D. Mo. Aug. 2, 2011)
- McNally v. Prison Health Servs., 46 F. Supp. 2d 49, 58-59 (D. Me. 1999)
- Burger v. Bloomberg, 418 F.3d 882, 883 (8th Cir. 2005) (per curiam)
- Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc., 526 U.S. 344, 350 (1999)
- Printed Media Servs., Inc. v. Solna Web, Inc., 11 F.3d 838, 843 (8th Cir. 1994)
- Adams v. AlliedSignal Gen. Aviation Avionics, 74 F.3d 882, 885-86 (8th Cir. 1996)

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